

**From:** [Ogulei, David](#)  
**To:** ["Schnepp, Jason"](#)  
**Subject:** St. Gobain  
**Date:** Thursday, May 23, 2013 3:43:00 PM

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Jason,

As I was perusing through the draft St. Gobain permit, I started wondering if downward adjustments to the baseline actual emissions were triggered or applied in this case.

[http://yosemite.epa.gov/r5/in\\_permt.nsf/748c56abd175a6b38625762300779288/4cc57046f87472be86257b6e00589081!OpenDocument](http://yosemite.epa.gov/r5/in_permt.nsf/748c56abd175a6b38625762300779288/4cc57046f87472be86257b6e00589081!OpenDocument)

Under § 52.21(b)(48)(ii)(b) and (c), the baseline actual emissions need to be adjusted downwards for non-compliant emissions and new emissions restrictions, including new control equipment. St. Gobain is under a global settlement that arguably is related to previous violations, and that might mandate new controls – so I'm wondering if this is something we want to look further into.

I haven't reviewed all of the information surrounding this project (e.g., the application) so it's possible that this was already addressed. In any case, I wanted to get you thinking about it, and then we can discuss it next week or so if necessary.

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